



Los Angeles County Registrar-Recorder/County Clerk

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Registrar-Recorder/County Clerk

May 28, 2014

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

REPORT ON THE COUNTY'S ONLINE FILING SYSTEM'S ABILITY TO PROVIDE FOR THE EFFICIENT AND SECURE ELECTRONIC SUBMISSION, STORAGE & RETRIEVAL OF CAMPAIGN STATEMENTS, REPORTS, & OTHER RELATED DOCUMENTS

SUBJECT

In support of the proposed ordinance introduced on May 27, 2014 amending political campaign finance regulations of Title 2 of the County Code, the Registrar-Recorder/County Clerk (RR/CC), pursuant to the requirements of GC 84615(a), submits this report on the ability of its on-line filing system to adequately provide the following for statements, reports, or other documents required under Chapter 4 of Title 9 of the Government Code:

- 1) Compliance with all requirements prescribed by GC84615(b) – GC84615(j);
- 2) Electronic storage and access to supplementary campaign filing forms and documents;
- 3) A secure environment in which to store and protect the integrity of the content submitted.

FINDINGS

The requirements of the RR/CC on-line filing system are in no way different from, nor do they supersede, the requirements established by law (regardless of medium) for campaign statement filings.

In order to ensure compliance to the on-line filing requirements, the RR/CC will provide for all necessary notification, in-person training of officeholders, committee representatives or candidates, and technical support needed to further facilitate any transition.

1) Compliance with Government Code 84615 requirements

The RR/CC's TRACCER (Track Registrar-Recorder's Automated Campaign Contributions Electronic Reports) system allows candidates, committees, and other persons required to submit campaign statements to electronically file their Form 460 statements directly with the RR/CC.

The TRACCER system provides a straightforward and accommodating process for the potential filer and effectively expedites the public's access to information disclosed in those statements while remaining fully compliant with legal requirements. A recent examination of TRACCER determined that the system fully met the necessary conditions stipulated in GC 84615 subdivisions (b) through (j). Therefore we are satisfied that all systems employed by the County for the purpose of filing campaign statements, reports or other related documents will operate securely, effectively and will not unduly burden filers.

2) Electronic storage and access to supplementary campaign filing forms & documents

In order to provide expedited public access to campaign filings that will not be submitted through the TRACCER system, the RR/CC manually processes paper submissions into an electronic format that is handled, displayed and stored under the same provisions prescribed by GC 84615 with the same security protocols as on-line filings.

Campaign reports submitted by candidates or committees, including forms 401 - Slate Mailer Organization Statements, 496 – Independent Expenditure Reports, and 497 – Late Contribution Reports, will be scanned and uploaded as viewable, but unalterable electronic images into the same secure database that houses the TRACCER filings for public access.

3) A secure environment in which to store and protect the integrity of the content submitted

The RR/CC employs cryptographic protocols to protect all internet communications to and from its online campaign filing TRACCER system. Utilizing the same standards as financial institutions and other government entities, TRACCER encrypts data flowing between users and the database, allowing for full protection and confidentiality.

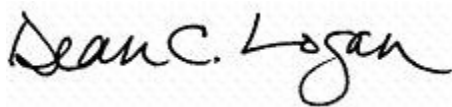
The ability to upload campaign filings to the system requires a special login ID. Applicants for a login ID are thoroughly vetted by the RR/CC and only qualifying individuals are permitted access.

The repository for all filings is hosted by the Internal Services Department which employs the highest levels of security to protect any vital County data.

CONCLUSION

Upon close examination of the RR/CC's process for filing of campaign statements, providing expedited access for public examination, and protecting all content, this report finds that the current systems utilized by the RR/CC meet necessary security requirements to operate and provide adequate public access while not placing any undue burden on the candidate or committee compelled to use it.

Respectfully submitted,



DEAN C. LOGAN
Registrar-Recorder/County Clerk